

W. Harman Nicodemus and  
Mary E. Nicodemus, his  
wife.

vs.

Isabella Louise Nicodemus  
and Eugenia Browning Nicodemus

No. 10472 Equity.

In the Circuit Court for  
Frederick County.

TO THE HONORABLE THE JUDGES OF SAID COURT:

The Bill of Complaint of W. Harman Nicodemus and Mary E.

Nicodemus his wife, respectfully represents unto your Honorable Court:

FIRST: That a certain America E. B. Nicodemus, late of Frederick County, Maryland, died on the 20th, day of December 1919<sup>intestate</sup> seized and possessed of Three tracts or parcels of land situate in Frederick City, Frederick County, Maryland, fully described in the following deeds:

Deed from George A. Dean and Alice R. Dean to America E. Nicodemus dated April 1st, 1909 and recorded in Liber S.T. H. No. 287, folio 141, one of the Land Records for Frederick County, a certified copy of which is filed herewith marked "Exhibit No. 1."

Also Two pieces of real estate which were devised to the said America E. B. Nicodemus by her husband, William H. Nicodemus by his last Will and Testament, recorded in Liber S.D.T. No. 1, folio 433 one of the Will Records in the office of the Register of Wills for Frederick County, a certified copy of which is filed herewith marked "Exhibit No. 2". The said Two pieces of property covered by said last Will and Testament are the same properties that were conveyed to the said William H. Nicodemus by Mollie C. and Alton Carty by deed dated February 19th, 1890, and recorded in Liber W.I.P. No. 11, folio 15; and the other parcel is the same that was conveyed by George W. Heinlein and Bertha B. Heinlein, his wife, to William H. Nicodemus by deed dated December 8th, 1900 and recorded in Liber D.H.H. No. 7, folio 492, one of the Land Records for Frederick County.

SECOND: That the said America E. B. Nicodemus left surviving her as her heirs at law, to whom said real estate descended to and vested in, as heirs at law and tenants in common, your Complainant